

### DRAWINGS AMENDMENTS

Replacement and annotated drawing sheets for Figs. 2, 7, 8, 9 and 10 are attached.

### REMARKS

This Reply is being filed in response to the Notice of Non-Compliant Amendment dated September 7, 2006. This Reply contains a copy of the Reply filed on July 5, 2006, along with a claim listing, which sets forth the current status of all of the claims. The claim listing is being submitted for purposes of expediting prosecution, although a claim listing was not required for the last Reply that was filed by Applicant. In this regard, the rules are clear that a claim listing is required only when there is "a change to an existing claim, cancellation of an existing claim or addition of a new claim." 37 C.F.R. § 1.121(c). The last Reply contained no such claim change, cancellation or addition. Thus, Applicant is unclear as to the basis for the Notice of Non-Compliant Amendment.

In an Office Action mailed on April 5, 2006, objections were made to the drawings; claims 22 and 24-26 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Huber in view of Ackroyd; claim 1, 3-21 and 31-33 were allowed; and claim 23 was indicated as being allowable if rewritten in independent form.

A drawing amendment is being submitted concurrently herewith to overcome the corresponding objections to the drawings. Additionally, a clean and marked-up versions of a substitute specification are being submitted herewith to address the changes made to the drawings. The substitute specification contains no new matter. With these changes, Applicant submits that the drawing objections have been overcome.

Regarding the § 103 rejection of independent claim 22, the method of independent claim 22 recites locking tools together by decompressing a sleeve and further recites the sleeve includes lugs to engage each tool to prevent the tools from rotating out of threaded engagement.

Claim 22 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Huber in view of Ackroyd. However, a *prima facie* case of obviousness has not been set forth for claim 22 for at least the following reasons.

A *prima facie* case of obviousness requires the Examiner to show that one skilled in the art, *without knowledge of the claimed invention*, would have modified a reference to derive the claimed invention (*emphasis added*). M.P.E.P. § 2143. In other words, for the instant application the Examiner must show that a suggestion or motivation exists in the prior art to modify Huber in view of Ackroyd to derive the claimed invention. However, the cited art fails to contain a suggestion or motivation to modify Huber's connector to include Ackroyd's tangs 40.

Ackroyd discloses a slip connector 28, which includes tangs 40 that engage a connector portion 38 of a bottom sub 36 (see Fig. 4 of Ackroyd). Ackroyd states, "the tang connection between the slip and the bottom sub provides for ease of removal of the connector from the coiled tubing upon removal from the well bore." Ackroyd, 2:46-49.

Huber discloses a connection system that includes a first section 10a, which is adapted to be inserted into a second section 10b, as depicted in Fig. 2a of Huber. The first section 10a includes a torsion spring 10a4 that holds the second section 10b in a locked position. Huber, 9:53-55. As depicted in Fig. 2a, the torsion spring 10a4 is located in the interior (from a longitudinal standpoint) of the first section 10a and does not contact even one of the tools that are being connected by the first 10a and second 10b sections. Thus, there is no suggestion or motivation to modify the torsion spring 10a4 to include lugs to engage a tool being connected by compression of the torsion spring 10a4.

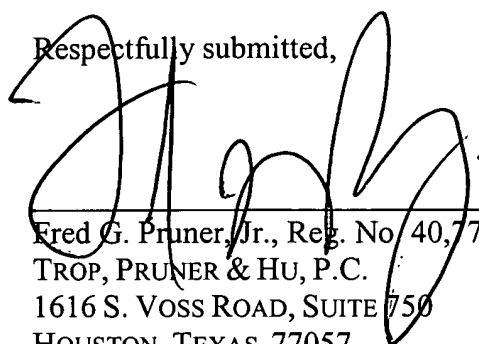
The Examiner refers to the language present in lines 20-21 in column 1 of Ackroyd for the alleged suggestion or motivation for the modification of Huber in view of Ackroyd. This language recites the desirability to have connectors that provide for ease of disconnection in use upon withdrawal of the wellbore. Office Action, 3. However, Huber's connection system is purportedly readily easy to disconnect and there appears to be no reason why the torsion spring 10a4 of Huber needs to be removed from other components of the first section 10a of the connector. Such a disassembly would not ease the disconnection of Huber's connection system. Thus, without the requisite suggestion or motivation for the modification of Huber in view of Ackroyd, a *prima facie* case of obviousness has not been set forth for claim 22.

Claims 24-26 are patentable for at least the reason that these claims depend from an allowable claim. Therefore, for at least the reasons that are set forth above, withdrawal of the remaining § 103 rejections of claims 22 and 24-26 is respectfully requested.

### CONCLUSION

In view of the foregoing, withdrawal of the § 103 rejections and a favorable action in the form of a Notice of Allowance are requested. No fee is believed due, as the reply is being filed in the thirty day window of time established by the Notice of Non-Compliant Amendment dated September 7, 2006. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (SHL.0281US).

Respectfully submitted,



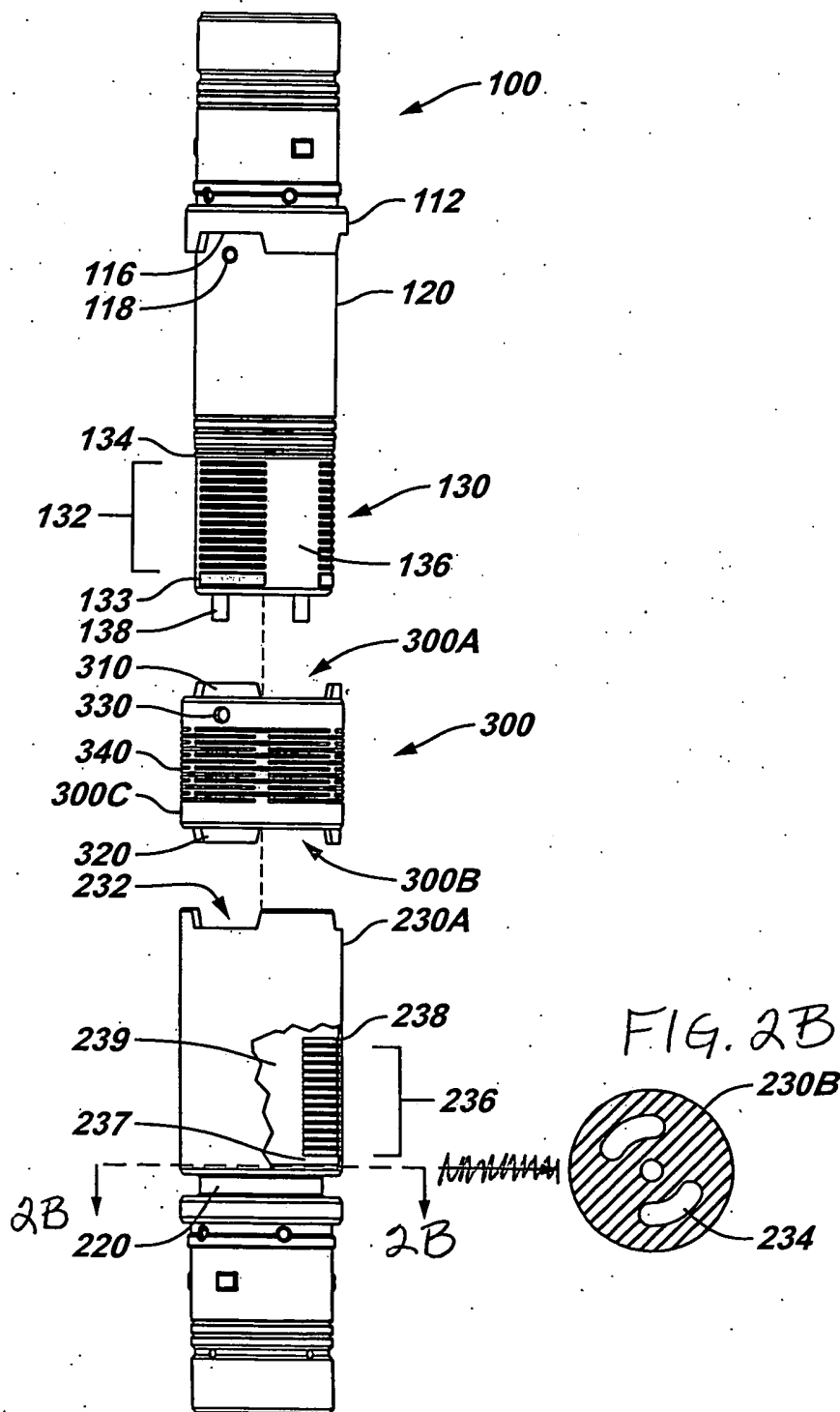
Fred G. Pruner, Jr., Reg. No. 40,779  
TROP, PRUNER & HU, P.C.  
1616 S. VOSS ROAD, SUITE 750  
HOUSTON, TEXAS 77057  
713/468-8880 [Phone]  
713/468-8883 [Fax]

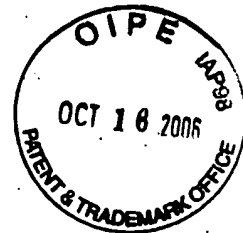
Date: October 5, 2006



2/9

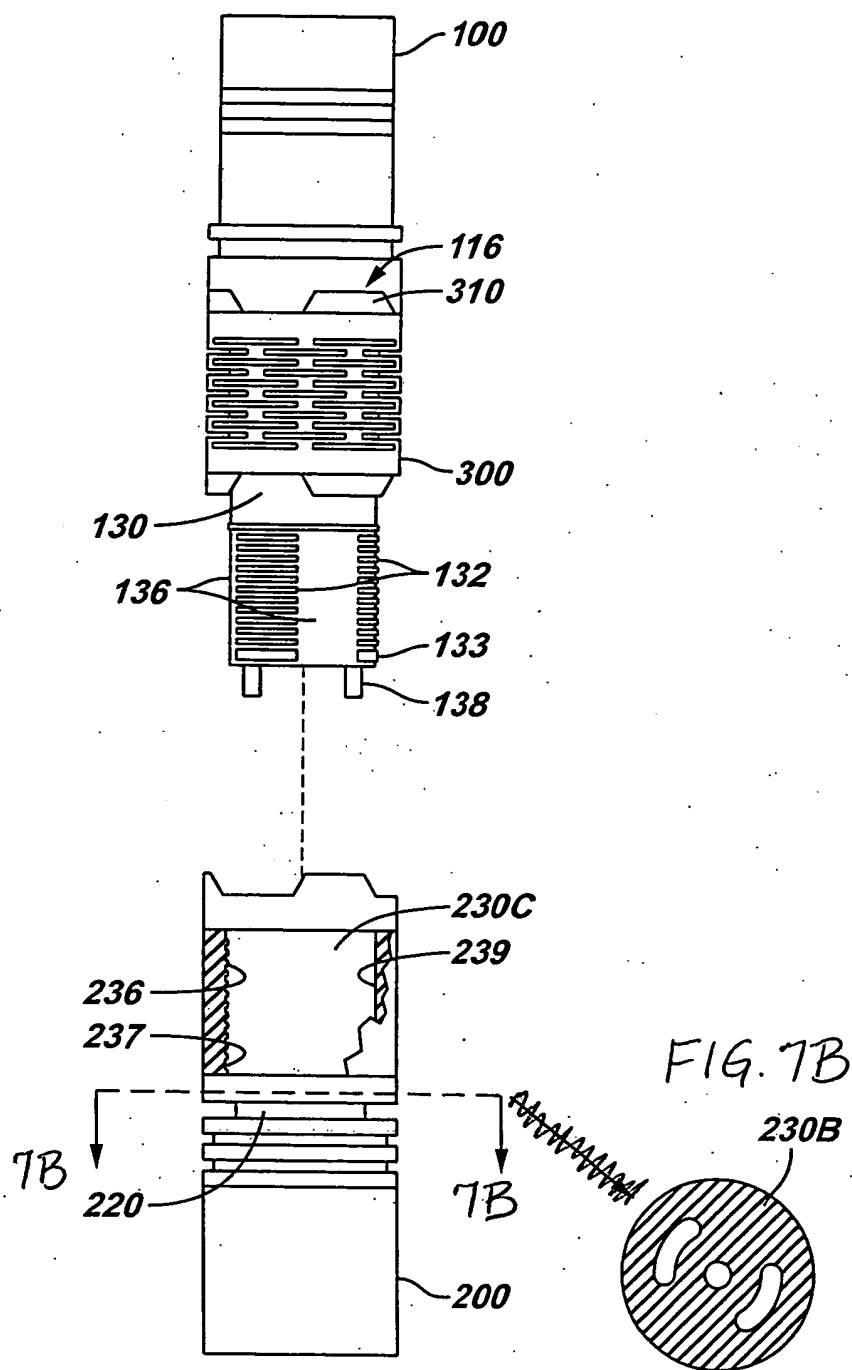
FIG. 2A





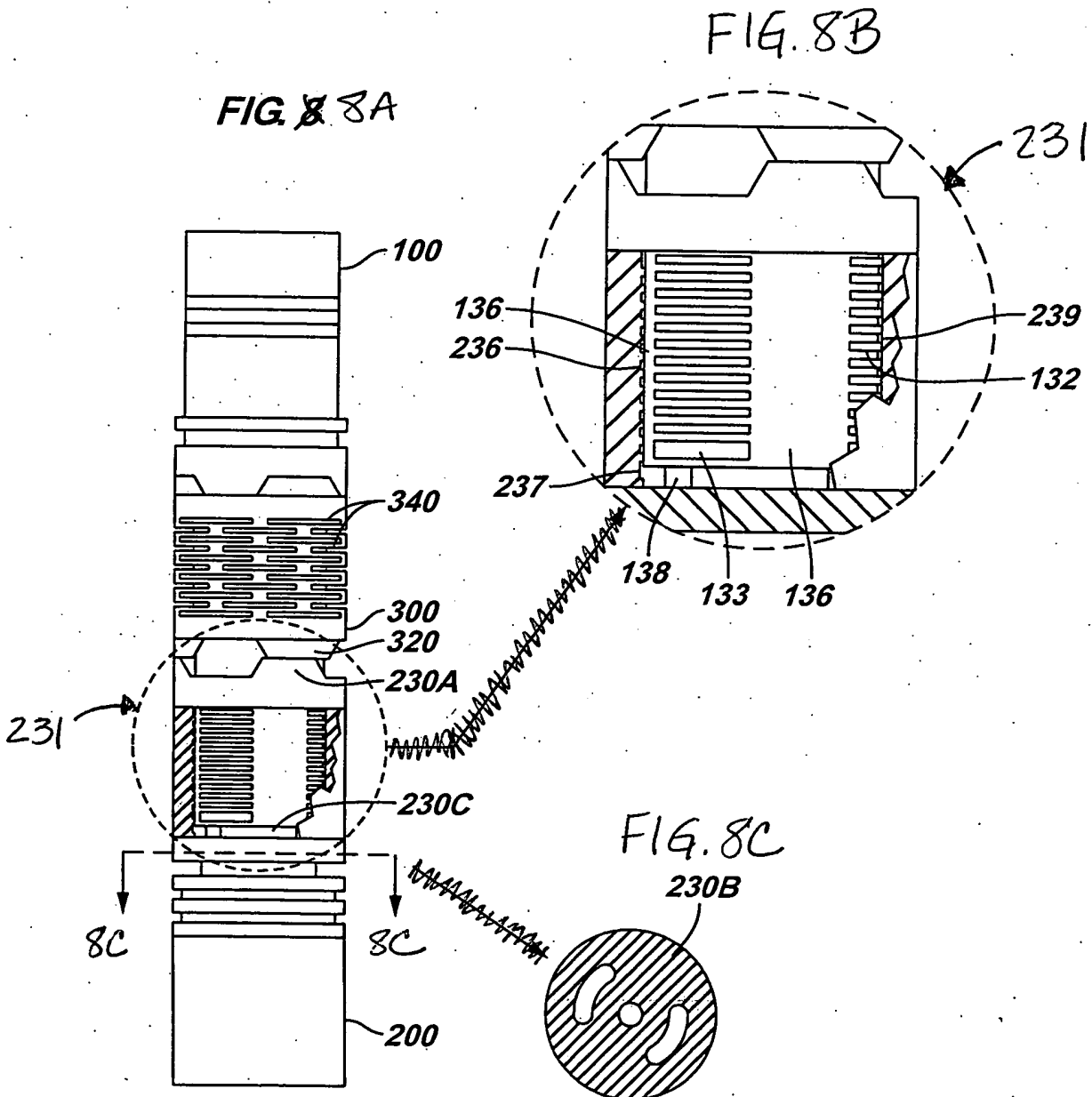
5/9

FIG. 7A





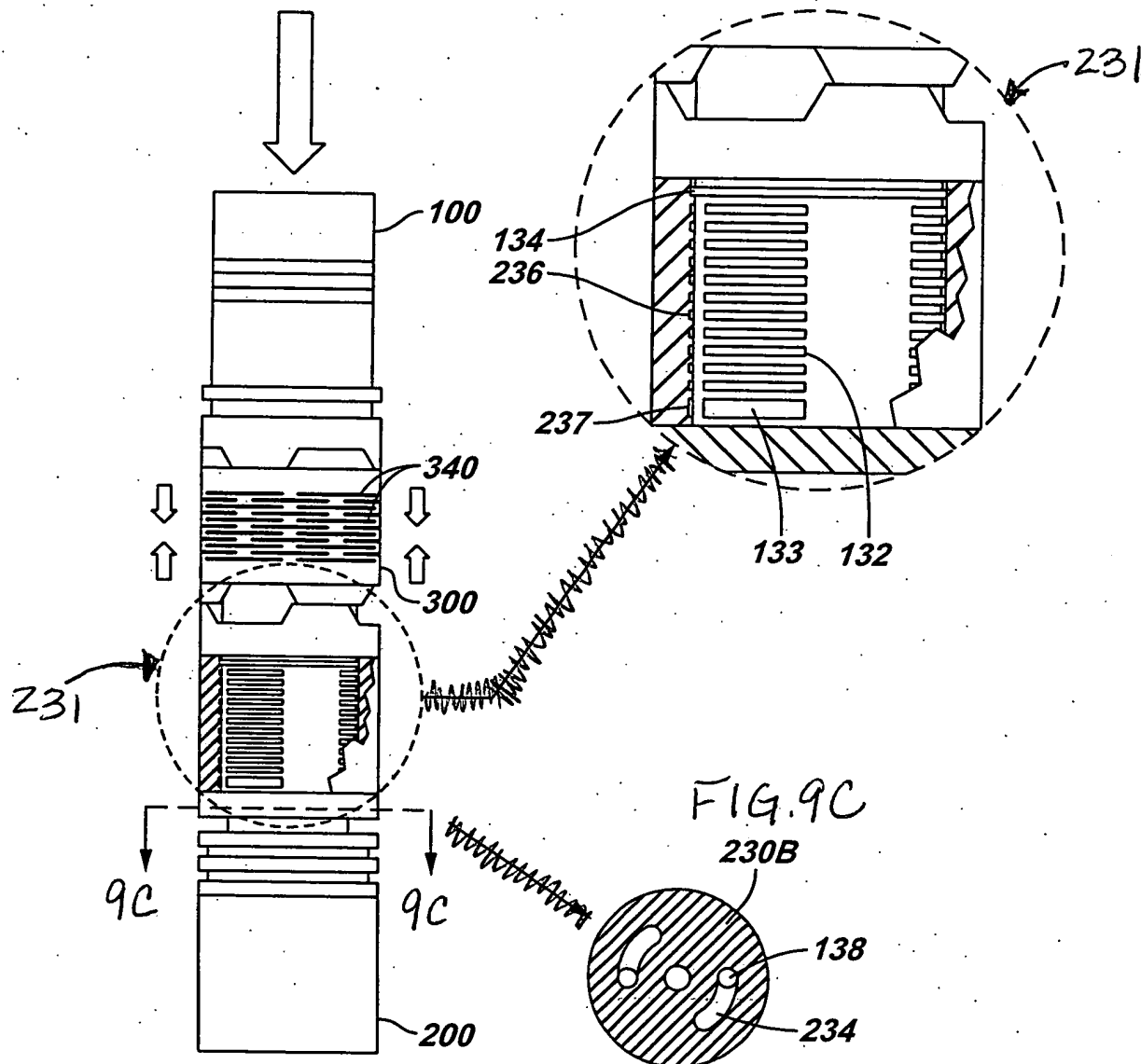
6/9



7/9

FIG. 9A

FIG. 9B





8/9

